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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
PROTECTION REGARDING DRAFT WORK PLAN FOR SOIL REMOVAL AND MONITORING
AT SITE 250 NS MAYPORT FL
11/7/2005
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Colleen M. Castille
Secretary

November 7, 2005

Ms. Beverly Washington
Department of the Navy, Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive, PO Box 190010
North Charleston, South Carolina 29419-9010

file: 250WP1105.doc

RE: Draft Work Plan for Soil Removal and Monitoring at Site 250, Mayport Naval Station;
Mayport, FL

Dear Ms. Washington:

I have reviewed the above document dated November 2005 (received November 4, 2005). This not a required document for sites governed by Chapter 62-770, F.A.C. and my comments are submitted as a courtesy. I recognize that the contractor conducting this proposed work is not the same contractor that conducted the site assessment on this site. I say this because this document does not represent the normal workflow and documents generated for sites governed by Chapter 62-770, F.A.C. as specified in the rule. For instance, the document for this stage in the process would normally be a Remedial Action Plan, submitted subsequent to a final Site Assessment Report (SAR) or a SAR Addendum (SARA), not Source Removal and Monitoring Work Plan. This can be confusing. In my review of the preceding SAR dated February 1, 2005, I stated:

"The document summarizes the soil contamination at the site and proposes a source removal for all of the contamination except for that under the sewer line. I concur. Please furnish a figure with the source removal report that delineates the area of remaining soil. This will be needed when formulating the anticipated land use controls for the site."

In that letter, I should have specified that the work be conducted subsequent to submitting a Remedial Action Report (RAP). In the present document, I have reviewed only Section 3.2.2 to Section 3.6. Following are my comments in that regard:

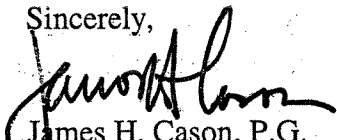
1. Taking into account my previous comments on the SAR, please adequately relate the proposed excavation area(s) to the previously-prepared contaminated soil assessment information previously prepared by Tetra Tech NUS in order to insure that the excavation will indeed remove all contaminated soil as the work plan seems to indicate.

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2. Please provide documentation of the adequacy/suitability of any backfill material used for that purpose, including analytical data and properly document the disposition of all excavated soil.
3. This site is governed under Chapter 62-770, F.A.C. A Site Assessment Report (SAR) has previously been reviewed and approved for the site. In order to satisfy the requirements of Chapter 62-770, F.A.C., please submit the documentation of the proposed work in a Site Assessment Report Addendum (SARA), providing the information enumerated in Section 3.6 and adequately relates the present activities to the recommendations and conclusions of the previous SAR. A recommendation for Post Active Remediation Monitoring as provided in Chapter 62-770.750 (1) and (2) and a Post Active Remediation Monitoring Plan (PARMP) as provided in Chapter 62-770.750 (5) may be included in the SARA, if appropriate. Results obtained from groundwater samples obtained after the soil remediation has occurred may be included in the proposed PARMP as the initial sampling event under the PARMP.

As I indicated at the Mayport Partnering meeting last week, my intent is to have the workflow and subsequent documents properly reflect the requirements of Chapter 62-770, F.A.C. Please insure that future documents follow the rule. If further clarification is required or if you have any questions, please contact me at 850-245-8999.

Sincerely,



James H. Cason, P.G.
Remedial Project Manager

CC: Diane Racine, NAVSTA Mayport
Mike Fitzsimmons, FDEP Northeast District Office, Jacksonville
Dale Frierson, WRS, Tallahassee
Tim Bahr, FDEP, Tallahassee

JJC  for ESN 